

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

UNITED STATES OF AMERICA,)
)
vs.) Case No.
) 2:20-cr-00007-PPS-JEM
LORENZO JOHNSON,)
)
Defendant.)
_____)

**EXCERPT FROM DAY THREE OF JURY TRIAL
TESTIMONY OF DOMINIQUE HARPER
AUGUST 13, 2021
BEFORE THE HONORABLE PHILIP P. SIMON
UNITED STATES DISTRICT COURT**

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DOMINIQUE HARPER - DIRECT

1 (The following is an excerpt from proceedings of
2 August 13, 2021, held in open court, reported as follows:)
3 (Jury in at 3:47 p.m.)

4 **THE COURT:** All right. You can be seated, ma'am. If
5 you would raise your right hand to please be sworn in.

6 (The oath was duly administered.)

7 **THE WITNESS:** Yes.

8 **THE COURT:** All right. You may be seated. You can
9 remove the mask while you're testifying so everybody can, sort
10 of, see you, okay?

11 Mr. Palomo, you may proceed.

12 **MR. PALOMO:** Good afternoon. You can actually take
13 your mask off if that's more comfortable for you.

14 **THE COURT:** Yeah.

15 **DOMINIQUE HARPER, GOVERNMENT'S WITNESS, SWORN**

16 **DIRECT EXAMINATION**

17 **BY MR. PALOMO:**

18 Q. Are you Dominique Harper?

19 A. **Yes.**

20 Q. I'd like to start, first, by asking whether you're
21 currently in custody?

22 A. **Yes.**

23 Q. I'm sorry. I asked you to remove your mask and didn't
24 remove mine. I'm sorry.

25 Are you facing charges in connection with communications

DOMINIQUE HARPER - DIRECT

1 with a Facebook user Ashley Campbell?

2 A. **Yes.**

3 Q. And can you describe those charges.

4 A. **Transportation of child pornography.**

5 Q. Have you been given immunity to testify here today?

6 A. **Yes.**

7 Q. I'm sorry?

8 A. **No.**

9 Q. I'm sorry?

10 A. **Yes.**

11 Q. You've been given immunity, or you've signed a plea
12 agreement?

13 A. **I signed a plea agreement.**

14 Q. So with the plea agreement, can you tell the jury what
15 that is.

16 A. **It's just me cooperating with the -- I'm nervous. I'm
17 just cooperating.**

18 Q. Okay. Have you been promised anything in connection with
19 your testimony today?

20 A. **No.**

21 Q. So why are you testifying here today?

22 A. **I'm hoping it will help me in a way.**

23 Q. I'd like to talk to you about messages that you've
24 exchanged with Ashley Campbell and also with Zoskie BigZo.

25 Do those names sound familiar to you?

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1 A. **Yes.**

2 Q. Who do you understand Zoskie BigZo to be?

3 A. **Lorenzo Johnson.**

4 Q. I'm going to show you Government Exhibit 14. Can you see
5 that on the screen in front of you?

6 A. **Yes.**

7 Q. Can you describe that first message that you received
8 there.

9 A. **It's just, he was asking if he knew me from somewhere.**

10 Q. Did he reach out to you, or did you reach out to him
11 first?

12 A. **I reached out to him.**

13 Q. How did you do that?

14 A. **I messaged him.**

15 Q. Why did you message him? Did you know him before?

16 A. **No.**

17 Q. So why did you message him?

18 A. **The girl that -- Ashley Campbell, she sent me to talk to
19 him. She said she knew him.**

20 Q. So the Ashley Campbell account said that you should look
21 up Zoskie BigZo?

22 A. **Yes.**

23 Q. So I'm going to direct your attention to the message from
24 Zoskie BigZo that I'm pointing to right here beginning at
25 10:51:28 p.m.

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1 What are you and Zoskie BigZo talking about?

2 A. **He was asking me what did I have to do for -- what did I**
3 **have to do with something with Ashley Campbell. She wanted me**
4 **to do something. She wanted me to send a picture of my son**
5 **penis.**

6 Q. Is that the conversation you're talking to Zoskie BigZo
7 about?

8 A. **Yes.**

9 Q. And what was his response?

10 A. **He was just like -- he just said: Damn, that's freaky.**

11 Q. Zoskie BigZo didn't say that's something you should call
12 the police about?

13 A. **No.**

14 Q. Directing your attention here to the conversation
15 beginning at 11:15:47 p.m. where Zoskie BigZo says, "If we did
16 nasty, we can get money too, but I don't want you doing
17 uncomfortable shit." What was your response?

18 A. **I told him that I was uncomfortable with touching kids.**

19 Q. And what's his response after that?

20 A. **He said him too, but hey.**

21 Q. What does he finish with there?

22 A. **"I never had nothing that tight, though. I came in two**
23 **minutes."**

24 Q. So next, we're going to pivot to the Ashley Campbell page;
25 but before we do that, you're talking about being uncomfortable

DOMINIQUE HARPER - DIRECT

1 with touching kids. Did you end up sending images of a child's
2 genitals to Ashley Campbell?

3 A. **Yes, I did.**

4 Q. And can you tell us about how that -- basically how that
5 compares to the statement that you're making here, what's going
6 on in your head.

7 A. **I don't know.**

8 Q. So the next one, Zoskie BigZo says, "Some parents need the
9 money." What was your reaction to that?

10 A. **I said, "Yeah."**

11 Q. And when you said, "Yeah," what were you thinking?

12 A. **Some parents do need the money, but I don't think that
13 they'll really do something like touch on their children.**

14 Q. And did you ever receive any money for any of this conduct
15 that we're talking about here?

16 A. **No.**

17 Q. And next you ask, "Is they watching you right now?" Why
18 did you ask that question?

19 A. **I was just asking the question to see.**

20 Q. Did you think somebody was monitoring Zoskie BigZo?

21 A. **Yes.**

22 Q. What caused you to think that?

23 A. **Because he said in a previous message something about they
24 was watching.**

25 Q. Did he say who "they" were?

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1 A. **No.**

2 Q. And then his response, "But I think the upload your
3 pictures you sent in screenshot. You might want to hit them."
4 What do you take that to mean?

5 A. **Maybe try to get rid of them, I guess, or don't do them.**

6 Q. Did somebody send you a screenshot of messages that you
7 exchanged with Ashley Campbell?

8 A. **Yes.**

9 Q. And what was that screenshot?

10 A. **It was a picture of -- it wasn't a child, but it was**
11 **someone under the age of 18 penis.**

12 Q. I'm going to show you Government Exhibit 6 next.

13 These are the Facebook messages between you and the Ashley
14 Campbell account. Do you recognize this?

15 A. **Yes.**

16 Q. Had you ever talked to Ashley Campbell before this?

17 A. **No.**

18 Q. Can you describe, then, how this message arrived in your
19 Facebook account?

20 A. **She was doing something with bank accounts, where you get**
21 **money from bank accounts.**

22 Q. But had you ever met an Ashley Campbell before?

23 A. **No.**

24 Q. So this message just kind of came out of the blue?

25 A. **Yes.**

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1 Q. And then Ashley Campbell account user says, "Okay. You
2 cute, though." What else did you guys talk about after that?

3 A. **We talked about if I like girls. I told her I was willing**
4 **to try to be with a girl, and she went on saying that I**
5 **probably can eat pussy for that.**

6 Q. I'm sorry. I didn't hear the last part. Ma'am, if you
7 could talk into the microphone just a little closer.

8 A. **She was saying that if I liked girls. I told her no but**
9 **I'm willing to try and that, if she can eat my pussy, she'll**
10 **have me go crazy.**

11 Q. I'm going to direct your attention to this message right
12 here from Ashley Campbell at 9:16:02 p.m. on August 30th.

13 What is Ashley Campbell asking you about here?

14 A. **Do I have kids and how old are they.**

15 Q. Had your conversation before really included much
16 discussion about kids?

17 A. **No.**

18 Q. So how many children do you have?

19 A. **Four.**

20 Q. Did you send any pictures of those children to
21 Ashley Campbell?

22 A. **Yes.**

23 Q. Now, at the message at 9:18:14, where Ashley Campbell
24 writes what Ashley Campbell writes there, if you could review
25 that quickly and then describe what was going through your head

DOMINIQUE HARPER - DIRECT

1 when you received that message.

2 A. I just thought it was kind of weird that she, like, touch
3 on her -- her kids.

4 Q. Prior to this message, had you sent any messages about the
5 sexual abuse of children?

6 A. No.

7 Q. So this was kind of the first time it came up?

8 A. Yes.

9 Q. So here at the bottom, where Ashley Campbell says, "I want
10 to watch it. You going to record it for me," what do you
11 believe she was talking about there -- or the Ashley Campbell
12 user was talking about there?

13 A. Me playing with my kids.

14 Q. And then does this continue to talk about your children?

15 A. Yes.

16 Q. In these messages, had you discussed the sexual abuse of
17 children?

18 A. No.

19 Q. So is it just Ashley saying these things?

20 A. Yes.

21 Q. Now, here in the middle of the page Ashley Campbell says,
22 "Show me what you got." What did you take that to mean?

23 A. She wanted me to -- to touch on my children -- one of my
24 children.

25 Q. You wrote, "Maybe later." What did you mean by that?

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1 A. I do it later. Maybe I do it later.

2 Q. Now, then you write this top message about your brother.
3 Why did you write that message?

4 A. She asked me if I have sex with my brother, and I said no,
5 my brother is not into that type of stuff.

6 Q. And then what's Ashley Campbell's response after you
7 finished discussing your brother?

8 A. She asked me if my son was going -- had a big dick.

9 Q. And then after this, Ashley Campbell asks if you got pics
10 of your daughter. What did you send?

11 A. A picture of my two oldest kids.

12 Q. So I'm going to show you Government Exhibit 6B.
13 Who are these children?

14 A. My oldest kids.

15 Q. And why did you send this picture to the Ashley Campbell
16 user?

17 A. She asked to see a picture of my kids.

18 Q. What is this image?

19 A. A picture of my daughter.

20 Q. And who are those children?

21 A. My two youngest kids.

22 Q. So, now, at the bottom of the page here -- I've gone to
23 August 30th, 2019. What does Ashley Campbell send to you?

24 A. She sent just talking about if my -- if my pussy is cute,
25 my kids cute, because these are cute. Ashley wants to taste

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1 **them.**

2 Q. Next, I'm going to go to messages beginning at 10:22 p.m.,
3 that same day, August 30th.

4 Ashley Campbell says something about her boss and says,
5 "Go add him on the book. BigZo Johnson. That man king of
6 freaky." Is this when you looked up the Zoskie BigZo account
7 that we were just reviewing earlier today?

8 A. **Yes.**

9 Q. When you say, "I think I found him," is that when you sent
10 that friend request?

11 A. **Yes.**

12 Q. After that, is that when you began communicating with
13 Zoskie BigZo?

14 Q. I'm showing you a screenshot here that's also found in
15 Exhibit 6E. Why did you send a screenshot of this BigZo
16 Johnson account?

17 A. **Just to make sure that I had the right person.**

18 Q. So you wanted to verify with the Ashley Campbell user that
19 you were communicating with the correct Lorenzo Johnson?

20 A. **Yes.**

21 Q. And then when you asked, "That's him," what's Ashley
22 Campbell's response?

23 A. **She said yes.**

24 Q. And then what does Ashley Campbell say next about
25 BigZo Johnson?

DOMINIQUE HARPER - DIRECT

1 A. She heard about him and he used to do porn.

2 Q. I'm going to direct your attention to messages beginning
3 on September 3rd, 2019, at 8:10 p.m. Ashley Campbell asks
4 you, "Maybe. What you going to do for me?" Why did she ask
5 that?

6 A. Because I asked if she could cash app me some money.

7 Q. Why did you ask Ashley Campbell if she could cash app you
8 some money?

9 A. I had cashed a fake check, and I needed the money to pay
10 the people back at the currency exchange.

11 Q. And then Ashley Campbell replies, "What are you going to
12 do for me?"

13 A. Mm-hmm.

14 THE COURT: Is that a yes?

15 THE WITNESS: Yes. I'm sorry.

16 THE COURT: Okay.

17 BY MR. PALOMO:

18 Q. What does Ashley Campbell ask you next?

19 A. She asked me where I was at.

20 Q. And then when you said, "I'm at home," what did Ashley
21 Campbell ask?

22 A. To take a picture of my son's dick.

23 Q. What did you do next?

24 A. I sent the thumb's up emoji.

25 Q. Did you send this picture?

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1 A. **Yes.**

2 Q. And this picture is also identified as Exhibit 6H, but
3 we'll keep this here.

4 Who is in this image?

5 A. **My son.**

6 Q. We're going to reference your son as "John Doe 3." You
7 don't need to say his name.

8 Can you describe how you took this picture?

9 A. **I took it through Facebook, through the Facebook
10 camera app.**

11 Q. And how did you take the picture, like, with the camera?
12 Can you describe to the jury how that happened.

13 A. **I just did it like this (indicating), and I took the
14 picture.**

15 Q. Where was your son and where were you when you took that
16 picture?

17 A. **We was in my room.**

18 Q. I'm sorry?

19 A. **We was in my room.**

20 Q. And can you describe --

21 A. **At my momma's house.**

22 Q. Can you describe how he was laying.

23 A. **He was laying on his back.**

24 Q. And how did you take a picture of his penis?

25 A. **I pulled the Pamper off, put it to the side.**

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1 Q. So is that a diaper that we see behind there?

2 A. **Yes.**

3 Q. How old is your son -- Or how old was your son at the time
4 of this picture?

5 A. **Two.**

6 Q. So when Ashley Campbell replies, "How much you need," what
7 was your response?

8 A. **"Just 40."**

9 Q. Did you ever receive any money from the Ashley Campbell
10 user?

11 A. **No.**

12 Q. We're skipping to the conversation beginning on
13 September 4th, 2019, at 5:10 a.m.

14 So the Ashley Campbell user says, "Good morning." Did you
15 reply to the Ashley Campbell user?

16 A. **No. No.**

17 Q. Why not?

18 A. **I just didn't reply back to her no more.**

19 Q. I'm sorry. I didn't catch that.

20 A. **I didn't -- I didn't want to reply back to her anymore.**

21 Q. Did you receive this screenshot from the Ashley Campbell
22 user?

23 A. **Yes. Yes.**

24 Q. What did you understand the screenshot to mean?

25 A. **That she still had it in, like, saved on -- in her phone.**

DOMINIQUE HARPER - CROSS

1 Q. And when the Ashley Campbell user says, "This going to
2 look bad on you. Hit me when serious and when you ready to act
3 right," did you ever reply?

4 A. **No.**

5 **MR. PALOMO:** No further questions.

6 **THE COURT:** Cross.

7 **CROSS-EXAMINATION**

8 **BY MR. TAVITAS:**

9 Q. Ma'am, as far as the agreement that you entered into, that
10 was just done maybe about a week-and-a-half ago; is that
11 correct?

12 A. **Yes.**

13 Q. And in that particular agreement, for the charge that
14 you're facing, you're facing a maximum sentence of 20 years'
15 imprisonment; is that correct?

16 A. **Yes.**

17 Q. Okay. And there's also what they call a statutory
18 mandatory minimum of five years of imprisonment; is that
19 correct?

20 A. **Yes.**

21 Q. What is -- What do you believe that to mean, the mandatory
22 minimum sentence of five years?

23 A. **That I have to do the five years.**

24 Q. And then there's also, in the agreement, there's something
25 called a 5K1.1; is that correct?

DOMINIQUE HARPER - CROSS

1 A. **Yes.**

2 Q. Did you actually have a lawyer on that case that you
3 entered a guilty plea into?

4 A. **I have an attorney.**

5 Q. Okay. And is your attorney present here this afternoon?

6 A. **Yes.**

7 Q. And all the way in the back of the courtroom?

8 A. **Yes.**

9 Q. And as far as that -- the plea agreement, again, it's the
10 same language, what they call cooperation of 5K1.1; right?

11 A. **Yes.**

12 Q. What is a 5K1.1? What do you understand that to mean?

13 A. **I honestly haven't asked that question.**

14 Q. Isn't it a fact that you're hoping that, because of
15 testifying here today, you're hoping to get some type of
16 leniency of your sentence; is that correct?

17 A. **Yes.**

18 Q. Okay. And also, do you know that the 5K1 motion is only
19 going to be -- could only be filed by the U.S. Attorney's
20 Office, that they -- Are you aware of that?

21 A. **Yes.**

22 Q. And that the value of any of your cooperation is
23 determined by them, not you; is that correct?

24 A. **Yes.**

25 Q. Now, the communication between -- Let me ask you this.

DOMINIQUE HARPER - CROSS

1 Have you met any of the U.S. Attorneys for the Northern
2 District of Indiana, the Hammond office, have you met with
3 them?

4 A. **Yes.**

5 Q. Do you remember when it was -- How many times have you met
6 with them?

7 A. **I think it was once, once.**

8 Q. And when you met with them, did they provide you any
9 correspondence, Facebook correspondence?

10 A. **Yes.**

11 Q. And what was -- what type of Facebook correspondence? Is
12 it the one that I went over with the U.S. Attorney this
13 afternoon?

14 A. **Yes.**

15 Q. Okay. There were two different accounts; correct?

16 A. **Yes.**

17 Q. -- or communications?

18 A. **Yes.**

19 Q. Okay. And the communications between -- first, go with
20 this is Zoskie BigZo. You saw a screenshot that -- just a few
21 minutes ago; is that correct?

22 A. **Yes.**

23 Q. Okay. At no point in that BigZo Zoskie, did it ever say
24 the name "Lorenzo Johnson;" correct?

25 A. **Yes.**

DOMINIQUE HARPER - CROSS

1 Q. Okay. And as far as -- Have you ever met Lorenzo Johnson?

2 A. **No.**

3 Q. And as far as the Ashley Campbell account, did you believe
4 at the time you were communicating -- I think it was maybe in
5 August and September of 2019 -- did you believe Ashley Campbell
6 to actually be a woman?

7 A. **Yes.**

8 Q. You didn't believe it to be Lorenzo Johnson, did you?

9 A. **No.**

10 Q. Okay. And even -- I know you indicated towards the latter
11 part of wanting to stop communicating with this Ashley
12 Campbell; is that correct?

13 A. **Yes.**

14 Q. Now, in the beginning, the first few days of messaging, it
15 looks like there was actually, like, a missed call from Ashley
16 Campbell to yourself through Facebook; is that correct?

17 A. **Yes.**

18 Q. Okay. And that was prior to you sending any type of
19 images to Ashley Campbell; is that correct?

20 A. **Yes.**

21 Q. Is that a yes?

22 A. **Yes.**

23 Q. Okay. And did you purposely not answer the call, the
24 first call to -- from Ashley Campbell, or was that just
25 inadvertent?

DOMINIQUE HARPER - CROSS

1 A. **I didn't -- I wasn't around my phone.**

2 Q. Did you ever try calling Ashley Campbell back?

3 A. **Yes. I think I have.**

4 Q. Okay. And did you actually ever succeed in calling Ashley
5 Campbell back?

6 A. **No.**

7 Q. And, ma'am, as far as -- How old are you, again, today?

8 A. **I'm 28.**

9 Q. Twenty-eight. Okay. When did you start using Facebook?

10 A. **When I was in high school, 15, 16.**

11 Q. All right. Would it be fair to say that you may have been
12 using Facebook, you know, give or take approximately 10 years?

13 A. **Yes.**

14 Q. Okay. How frequently would you use Facebook? Would it be
15 someone that -- Would you look at it every day, multiple times
16 a day, or maybe once a week?

17 A. **Multiple times a day.**

18 Q. All right. And in -- how many, actually -- How many
19 Facebook accounts did you have?

20 A. **Maybe three.**

21 Q. And in each of those three, approximately those three, are
22 you aware of what they call, like, a profile picture?

23 A. **Mm-hmm. Yes.**

24 Q. And explain to the ladies and gentlemen of the jury what a
25 profile picture is.

DOMINIQUE HARPER - CROSS

1 A. **A profile picture is just a picture of -- either it could**
2 **be yourself or your kids.**

3 Q. And of those three that you had, did you have your own
4 picture on all three of them, or did you have different images?

5 A. **My picture was on all three.**

6 Q. Okay. But you had the potential to put anyone else's
7 picture on there; is that accurate?

8 A. **Yes.**

9 Q. And as far as -- You could even put another woman's
10 picture on your account if you so desired; is that correct?

11 A. **Yes.**

12 Q. As it relates to -- Would it be fair to say that Zoskie
13 BigZo could have put any picture they wanted on that particular
14 account? Would that be fair to say?

15 A. **He could have.**

16 Q. And do you remember, as far as the Ashley Campbell, did
17 the Ashley Campbell actually ever have any type of profile
18 picture?

19 A. **She had a profile picture of herself and her two kids in**
20 **back.**

21 Q. Okay. And do you remember what she looked like?

22 A. **Kind of, yeah.**

23 Q. I'm sorry?

24 A. **Yes.**

25 Q. And if you could describe, to the best of your

DOMINIQUE HARPER - REDIRECT

1 recollection, the profile picture of this Ashley Campbell.

2 A. She was Caucasian, blond, blondish sandy brown hair, and
3 she had maybe blue eyes. They could have been gray.

4 Q. And, again, at the time of the transmission of any images
5 of your son to Ashley Campbell, you actually thought you were
6 sending it to this Caucasian woman; correct?

7 A. Yes.

8 Q. Okay. You didn't believe you were sending it to Lorenzo
9 Johnson?

10 A. No.

11 MR. TAVITAS: If I could just have one moment,
12 Your Honor.

13 THE COURT: Sure.

14 (Brief pause while Defendant and Mr. Tavitas inaudibly
15 conferred off the record).

16 MR. TAVITAS: No additional questions, Your Honor.

17 THE COURT: Any redirect, Mr. Palomo?

18 MR. PALOMO: Yes, Your Honor.

19 REDIRECT EXAMINATION

20 BY MR. PALOMO:

21 Q. Ma'am, are you aware that Lorenzo Johnson admitted to
22 using the Ashley Campbell page?

23 A. Yes.

24 Q. And regarding the questions about your cooperation, are
25 you testifying here because you actually did agree with the

1 user of Ashley Campbell to use your son to produce images of
2 his penis?

3 A. Yes.

4 MR. PALOMO: No further questions, Your Honor.

5 THE COURT: Mr. Tavitas, anything else?

6 MR. TAVITAS: No, Your Honor.

7 * * *

8 (End of requested transcript.)

9 CERTIFICATE OF REPORTER

10 I, Angela Phipps, RMR, CRR, certify that the
11 foregoing is a true and accurate excerpt of the record of
12 proceedings in the above-entitled matter before the Honorable
13 Philip P. Simon, on August 13, 2021.

14
15 Date: September 10, 2021 S/Angela Phipps, RMR, CRR
16 Official Court Reporter
17 for the U.S. District Court
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